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Protective Agreement and Order Entered
in Hausler v. The Republic of Cuba, et al.,
18 MS 302

Attorneys for Petitioner

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

JEANNETTE HAUSLER,

Petitioner,

v.

JP MORGAN CHASE BANK, N.A.,
CITIBANK, N.A., THE ROYAL BANK
OF SCOTLAND N.V. (FORMERLY
KNOWN AS ABN AMRO, N.V.), and
NATIONAL BANK OF CANADA,

Respondents,

09 Civ. 10289 (VM)

**NOTICE OF PETITION
FOR TURNOVER ORDER
PURSUANT TO FEDERAL RULE
OF CIVIL PROCEDURE
69 AND CPLR § 5225(b)**

RE: Fidel Castro Ruz, Raul Castro Ruz,
The Republic of Cuba, and
The Cuban Revolutionary Armed Forces

[JUDGMENT DEBTORS]

PLEASE TAKE NOTICE, that upon the annexed Petition of Jeannette Hausler ("Petitioner"), an application will be made to this Court, the United States District Court for the Southern District of New York (Marrero, D.J.), at the United States Courthouse located at 500 Pearl Street, New York, New York, 10007, Courtroom 20B, as soon as Petitioner may be heard, for an Order (the proposed form of which is attached as Exhibit E to the Petition) pursuant to § 201 of the Terrorism Risk Insurance Act of 2002 ("TRIA"), Pub. L. No. 107-297; 116 Stat. 2337, codified at 28 U.S.C. § 1610 note, Federal Rule of Civil Procedure Rule 69 and Section §

5225(b) of the New York Civil Practice Law and Rules compelling the turnover and payment of the funds held in the specified Accounts of Judgment Debtors (or their agencies or instrumentalities) presently in the possession of Respondent National Bank of Canada as garnishee, together with an award of the costs of this proceeding in favor of Petitioner, and for such other and further relief as may be just.

Dated: New York, New York
January 10, 2011

Respectfully submitted,

GREENBERG TRAURIG, LLP



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